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October 31, 1995

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Mr. William F. Caton, Acting Secretary Federal Communications Commission 1919 M Street, NW, Room 222 Washington, D. C. 20554

FEDERAL COMMUNICATIONS COMMISSION

Dear Sir:

Re: Exparte Meeting - Establishment of a Funding Mechanism for Interstate Operator Assistance for the Deaf, RM-8585

An exparte meeting was held today to discuss the above referenced Rulemaking proceeding. The areas of discussion included information provided in Comments filed by AT&T on March 16, 1995 and in its subsequent letter dated April 12, 1995.

Ms. Terri Skorupa, Product Manager, Operator Services for the Deaf, Steve Backof, Staff Manager, in the Accessible Communications Services Business Unit, and I attended the meeting for AT&T. Ms. Linda Dubroof, Deputy Chief, Gregory Forbes and Scott Shefferman, Staff Members, Domestic Services Branch, Network Services Division attended for the FCC. The attached material was used during the meeting.

Two copies of this notice were submitted to the Secretary of the FCC on the date of the meeting in accordance with Section 1.1206(A)(1) of the Commission's Rules.

Very truly yours,

Attachment

cc: L. Dubroof

G. Forbes

S. Shefferman

Hapker

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# OPERATOR SERVICES FOR THE DEAF (OSD)

#### **OBJECTIVE:**

OSD is a service provided by AT&T, permitting access to functionally equivalent operator services for people who are deaf, hard of hearing and/or speech disabled.

#### **SERVICE OVERVIEW:**

OSD provides the following services to TTY users:

## **Operator Assistance**

- Busy Line Verification
- Emergency Interrupt

Alternate billing options for TTY-TTY call connections

- Calling Card

- Credit Card

- Billed to Third Party - Collect

- Person-to-Person

-Station-to-Station

**Directory Assistance** 

# History of OSD

- AT&T has provided OSD since its inception, June 30, 1980 Pre-divestiture.
- OSD rates were included in the Shared Network Facilities Agreement (SNAFA) for the RBOCs.
- When SNAFA expired 12/92, AT&T began negotiations with RBOCs and large LECs (GTE, United).

# **OSD Provisioning**

- OSD calls are handled through the AT&T Relay Service Centers.
- Available 24 hours a day, seven days a week. TTY users can reach OSD directly by dialing 1-800-855-1155.
- OSD assistance is performed by AT&T Communications Assistants, who are highly trained and well-versed in deaf culture.

# **OSD FUNDING**

## Intrastate/IntraLATA

- Customer pays LEC state tariff rates
- LEC receives end-user revenue
- If AT&T/LEC contract, revenue to AT&T
- If no AT&T/LEC contract, AT&T receives no payment for OSD

## Intrastate/InterLATA

- Customer pays AT&T state tariff rates
- AT&T receives end-user revenue
- AT&T assumes cost of providing OSD

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- Customer pays LEC federal tariff rates
- LEC receives end-user revenue
- If AT&T/LEC contract, revenue to AT&T
- If no AT&T/LEC contract,
   AT&T receives no payment for OSD

## Interstate/InterLATA

- Customer pays AT&T federal tariff rates
- AT&T receives end-user revenue
- AT&T assumes cost of providing OSD

# FCC Should Dismiss SWB's Petition

• No basis to establish complex mechanism for shared funding of TTY operator services

• Carriers that choose to offer TTY operator services to their customers should bear the cost

• Provision of TTY operator services is not a carrier's ADA-mandated service obligation